

TO: CLERK, UNITED STATES DISTRICT COURT

333 LOMAS BLVD, NW

ALBUQUERQUE, NM 87102

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

SEP 20 2019

FROM: MICHAEL J NISSEN

P.O.W. # 02508151

P.O. Box 3540

MILAN, NM 87021

MITCHELL A. BLUMS
CLERK

GREETINGS,

I WOULD LIKE TO ADD THIS MEMORANDUM
AMENDED ADDITION FOR GROUND TWO OF
MY RECENTLY MAILED 28 U.S.C. § 2241
HABEAS CORPUS. PLEASE ADD THIS TO MY
FILE. CASE # 1:19-CV-00827-WJ-LF

AS EXPLAINED BY THE SUPREME
COURT IN *ELONIS V. UNITED STATES*, THE CASE
CONCERNED A PROSECUTION UNDER 18 U.S.C. § 875(L)
[135 S. CT. 2001], [192 L. ED. 2D 1] (2015).
THERE, THE SUPREME COURT HELD THAT IT
WAS ERROR FOR THE JURY TO BE INSTRUCTED
THEY NEED ONLY FIND THAT A REASONABLE
PERSON COULD REGARD THE DEFENDENTS
COMMUNICATIONS AS THREATS. *ID.*, *ELONIS*
DID NOT ANALYZE ANY REQUIREMENT TO
IDENTIFY AN INDIVIDUAL ON THE FACE OF
THE INDICTMENT, *ID.* MY CASE THAT

I WAS CONVICTED ON, IS IDENTICAL
TO THIS CASE LAW BEFORE YOU NOW,
WHICH MY INEFFECTIVE ASSISTANCE OF
COUNSEL FAILED TO BRING FORTH AT
PRE TRIAL OR JURY TRIAL. I FEEL IT
IS MY DUTY TO ADD THIS FOR
CONSIDERATION AT THIS GIVEN MOMENT.

MICHAEL NISSEN
REGISTER NO. 02508151
P.O. Box 3540
MILAN, NM 87021

Frank

ALBUQUERQUE
NM 870
19 SEP '19
PM 4 L



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"FRANK"
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BOWES
\$3.000.00
SEP 19 2019
"FRANK"

CLERK, UNITED STATES DISTRICT COURT
333 LOMAS BLVD, NW
ALBUQ, NM 87102
RECEIVED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

SEP 20 2019

MITCHELL R. ELPERS
CLERK

87102-227470

